

**IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION**

<b>BRACIE WELDON,</b>	)	<b>Case No. 1:18 CV 00910</b>
	)	
<b>Plaintiff,</b>	)	<b>Judge: Douglas R. Cole</b>
	)	
<b>-v-</b>	)	<b>Magistrate: KAREN LITKOVITZ</b>
	)	
<b>GREATER CINCINNATI BEHAVIORAL</b>	)	<b>ADDENDUM TO STIPULATED</b>
<b>HEALTH SERVICES,</b>	)	<b>PROTECTIVE ORDER</b>
	)	
<b>Defendant.</b>	)	

Now comes the Plaintiff, Bracie Weldon (“Plaintiff”), and the Defendant, Greater Cincinnati Behavioral Health Services (“Defendant”), by and through counsel, hereby stipulating and agreeing to the following Addendum to the Stipulated Protective Order entered in this case pursuant to Rule 26(C) of the Federal Rules of Civil Procedure (Doc. #15).

Any documents containing personal health information, including patient names and addresses shall be subject to all provisions of the Stipulated Protective Order entered in this case (Doc. #15), which equates to a “qualified protective order” as that term is defined in 45 C.F.R. § 164.512(e)(1)(iv) and (v). The parties agree disclosure of documents are subject to the additional following terms:

- Prohibits a party seeking protected health information from using or disclosing the protected health information for any purpose other than the litigation or proceeding for which the records are requested; and
- Requires either the return of the protected health information to the records provider or the destruction of the protected health information at the conclusion of the litigation or the proceeding.

In addition, the parties agree these additional terms outlined above do not remove any language from the prior signed and entered protection order entered on May 31, 2019.

**IT IS SO ORDERED.**

9/27/2021  
Date:

  
Magistrate Judge Karen Litkovitz

AGREED TO:

/s/ Donyetta D. Bailey (per authorization)  
Donyetta D. Bailey (0072433)  
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Trial Counsel for the Defendant

**EXHIBIT A**

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<b>BRACIE WELDON,</b>	)	<b>Case No. 1:18 CV 00910</b>
	)	
<b>Plaintiff,</b>	)	<b>Judge: Douglas R. Cole</b>
	)	
<b>-v-</b>	)	<b>Magistrate: KAREN LITKOVITZ</b>
	)	
<b>GREATER CINCINNATI BEHAVIORAL</b>	)	<b>STIPULATED PROTECTIVE ORDER</b>
<b>HEALTH SERVICES,</b>	)	
	)	
<b>Defendant.</b>	)	

I have read the Agreed Protective Order concerning the confidentiality of information in the above-captioned litigation. I understand that the Agreed Protective Order is a Court order designed to preserve the confidentiality of certain confidential information. I also understand that the Agreed Protective Order and Addendum to the Protective Order restricts the use, disclosure and retention of such confidential information and also requires the safeguarding and return of documents and other materials containing confidential information.

I agree to comply with all provisions of the Protective Order and the Addendum to the Protective Order with respect to any information designated confidential that is furnished to me, including the provisions of Paragraph 9 regarding preserving the confidentiality. I further hereby submit myself to the jurisdiction of the Court for purposes of enforcement of the provisions of the Protective Order and Addendum to the Protective Order.

AGREED TO:

\_\_\_\_\_

Printed Name \_\_\_\_\_